

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA

v.

ERIC MOLIGNARO

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CR. NO. 04-10373-MLW

**JOINT MOTION FOR EXCLUDABLE TIME**

The United States of America, by Assistant U.S. Attorney Ann Taylor, and the defendant Eric Molignaro, by counsel Miriam Conrad, Esq., jointly move pursuant to 18 U.S.C. § 3161(h)(8)(A) and Local Rule 112.2(A)(2) that the sixty-eight (68) day period of time commencing on April 29, 2005, the date of the interim status conference, through July 6, 2005, the date of a scheduled interim status conference, be excluded from computation under the Speedy Trial Act of the time within this case must be tried. As reason therefore, the parties represent that this additional time is necessary for the defendant to review the discovery that has been provided by the government and to file substantive motions. It is therefore in the interests of justice that the instant motion be allowed.

WHEREFORE, the parties request that the Court enter a written order of excludable

delay covering the period of April 29, 2005 through July 6, 2005.

Respectfully submitted,

MICHAEL J. SULLIVAN  
United States Attorney

By: /s/ Ann Taylor  
Ann Taylor  
Assistant U.S. Attorney

ERIC MOLIGNARO  
Defendant

By: /s/ Miriam Conrad  
Miriam Conrad  
Counsel for Eric Mollgnaro

DATE: April 29, 2005